

THE VIGILANTE LAW FIRM, P.C.

By: Jacqueline M. Vigilante, Esquire

Attorney I.D. No. 030961988

By: Christopher J. Ross, Esquire

Attorney I.D. No. 306212019

99 North Main Street

Mullica Hill, NJ 08062

(856) 223-9990

Attorneys for Scott E. Braidwood Respondent

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE:

Choates G. Contracting, LLC

Case No.: 21-13085-ABA

Chapter No.: 11

**SUPPLEMENTAL CERTIFICATION OF SCOTT E. BRAIDWOOD IN
OPPOSITION TO MOTION TO APPROVE SALE OF 122 DANTON LANE,
MULLICA HILL, NEW JERSEY 08062 FREE AND CLEAR OF LIENS, TO
AUTHORIZE DISTRIBUTION OF SALES PROCEEDS, TO VOID
JUDGMENT OF TURN-KEY MANAGEMENT CORP.**

I, SCOTT E. BRAIDWOOD, of full age, does hereby certify as follows:

1. I am the judgment creditor of Darryl K. Choates, a principle of Debtor and the mortgagee of the “Braidwood Mortgage” referred to in Debtor’s motion. I have personal knowledge of the facts set forth herein.

2. The Braidwood Mortgage is a lien against 122 Danton Lane, Mullica Hill, New Jersey the “Property”), which lien Debtor seeks to have this Court dismiss.

3. I make this Supplemental Certification in support of my opposition to Debtor's Motion to Approve the Sale of the Property free and clear of liens.

4. Due to the fact that I was not a named creditor herein, I was not provided with notice of Debtor's bankruptcy filing or of the proposed sale of the Property until August 19, 2022.

5. I submit this Supplemental Certification to object to the sale of the Property because I believe the sales price is well below true market value.

6. At the time I filed my opposition to Debtor's motion, I did not have the benefit of researching the market value of the Property or time to consult with a real estate professional regarding what an adequate sales price for the Property would be.

7. I am concerned that due to the relationship between the Debtor and the Buyer, is the brother of Debtor's principle Darryl K. Choates and a co-principle of the company, that the proposed sale of \$600,000 is not an arm's length negotiated sales price.

8. Based on research I have done since the filing of my opposition as listed below, it appears the \$600,000 sales price of the Property is between \$80,000 to \$180,000 below market value. The following websites reflect a more true market value of the Property, as follows:

a) Zillow.com \$773,000

https://www.zillow.com/homedetails/122-Danton-Ln-Mullica-Hill-NJ-08062/121943749_zpid/

b) Realtor.com \$679,800

<https://www.realtor.com/realestateandhomes-detail/M5736101296>

c) Trulia.com \$733,000

<https://www.trulia.com/p/nj/mullica-hill/122-danton-ln-mullica-hill-nj-08062--1101223720>

9. I consulted with a licensed New Jersey realtor familiar with the Mullica Hill real estate market, David Marcantuno, who regularly engages in the listing and sale of real estate in the Mullica Hill, New Jersey area. Mr. Marcantuno concurs the sale price of \$600,000 for the Property is too low to be reasonable based on the comparative sales in the area.

10. David Marcantuno prepared a comparative market analysis which indicates that the market price of the Property is \$689,930, with houses in that area selling for as high as \$799,999.00. *See Exhibit 12.*

11. I submit that in the open market, even with a real estate commission, the net proceeds to the Debtor's estate would be greater than suggested in Debtor's motion.

12. As stated in my opposition, Debtor's principal Darryl K. Choates previously convinced me to allow title of the Property to transfer on the promise that I would be paid as a mortgagee, and I was not paid. Debtor's attempt to sell the Property to its principle and his brother is another example of Mr. Choates trying to keep the Property and subvert payment of the judgment obtained by me against him.

I certify the above statements are true under penalty of perjury.

Date: September 12, 2022

By: /s/Scott E. Braidwood
Scott E. Braidwood